

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION and

THE PEOPLE OF THE STATE OF NEW
YORK, by LETITIA JAMES, Attorney
General of the State of New York,

Plaintiffs,

v.

QUINCY BIOSCIENCE HOLDING
COMPANY, INC., a corporation;

QUINCY BIOSCIENCE, LLC, a limited
liability company;

PREVAGEN, INC., a corporation
d/b/a/ SUGAR RIVER SUPPLEMENTS;

QUINCY BIOSCIENCE
MANUFACTURING, LLC, a limited
liability company; and

MARK UNDERWOOD, individually and as
an officer of QUINCY BIOSCIENCE
HOLDING COMPANY, INC., QUINCY
BIOSCIENCE, LLC, and PREVAGEN,
INC.,

Defendants.

Case No. 1:17-cv-00124-LLS

**NOTICE OF MOTION FOR
PERMANENT INJUNCTION BY
PEOPLE OF THE STATE OF
NEW YORK BY LETITIA
JAMES, ATTORNEY GENERAL
OF THE STATE OF NEW YORK**

Plaintiff People of the State of New York, by Letitia James, Attorney General of the State of New York, moves this Court for an Order, pursuant to New York Executive Law § 63(12) and New York General Business Law § 349(b), permanently enjoining Defendants Quincy Bioscience Holding Company, Inc., Quincy Bioscience, LLC, Prevagen, Inc., and Quincy Bioscience Manufacturing, LLC (“Corporate Defendants”) from engaging in fraudulent and deceptive business practices in violation of the New York Executive and General Business Laws. The text of the Proposed Order is submitted herewith.

Date: September 26, 2024

Respectfully submitted,

PEOPLE OF THE STATE OF NEW YORK
BY LETITIA JAMES,
Attorney General of the State of New York

By: /s/ Kate Matuschak

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CERTIFICATE OF SERVICE

I certify that on this 26th day of September 2024, I served counsel of record via ECF the foregoing Notice of Motion for Permanent Injunction by People of the State of New York by Letitia James, Attorney General of the State of New York.

/s/ *Kate Matuschak*

Kate Matuschak